



## THE CITY OF NEW YORK LAW DEPARTMENT

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## **VIA ECF**

MURIEL GOODE-TRUFANT

Corporation Counsel

The Honorable Jessica G.L. Clarke United States District Judge Southern District of New York 500 Pearl Street New York, N.Y. 10007

Re: SeanPaul Reyes v. City of New York, 23 Civ. 6369 (JGLC)

Your Honor:

I am a Deputy Chief in the Special Federal Litigation Division of the New York City Law Department. I write on behalf of my colleague, Senior Counsel Mark Zuckerman who represents defendant City of New York in the above referenced matter. The parties write jointly to respectfully request that their time to submit a revised case management order be extended from January 20, 2025 to February 5, 2025, and that discovery be stayed during that period of time.

As the Court is aware, the Second Circuit Court of Appeals heard oral argument on the City's appeal of this Court's preliminary injunction order on November 13, 2024, and decision was reserved. We are still waiting for a decision from the Circuit. The parties recently requested and were granted an extension of time to submit a revised case management plan from December 20, 2024 to January 20, 2025. The additional extension is necessary because Mr. Zuckerman has been on medical leave for the past six weeks but is expected to return to work next week. The additional extension of time will allow counsel to further confer about the case management plan and the case.

This is the fourth extension request regarding the revised case management plan. The parties thank the Court for your consideration herein.

Respectfully submitted,

/s/ Mary O'Flynn Mary O'Flynn Senior Counsel

cc: All Counsel (via ECF)

Application GRANTED. The parties shall file a revised case management plan on or before **February 5, 2025**. Discovery remains STAYED until that time. The Clerk of Court is respectfully directed to terminate ECF No. 115.

SO ORDERED.

JESSICA G. L. CLARKE United States District Judge

Dated: January 21, 2025 New York, New York

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